



ESG Policy

Environmental, Social and Governance

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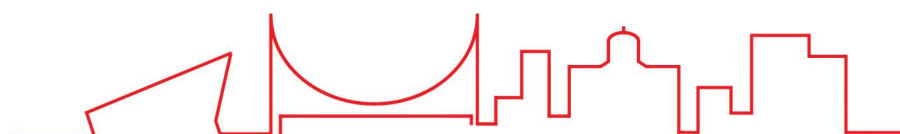
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Document Change History

Version	Date	Summary of Changes/Comments	Author
1.0	06/06/2022	Document Approval for issue	JS

Document Version History

Version	Date	Summary of Changes/Comments	Author
1.0	10/01/2022	Document Creation and approval	JS



Introduction

Connexin Limited (“Connexin”) is responsible for building, operating, and managing a high-speed fibre to the premise network in the city of Kingston Upon Hull, and other neighbouring towns and villages. Connexin also provides smart IoT solutions across the UK.

Through its activities, Connexin provides essential infrastructure for key digital services and is dedicated to conducting itself in accordance with the highest legal, ethical, and professional standards throughout its business and operations.

This Environmental Social and Governance Policy (ESG Policy) (the Policy) sets out the aims and commitments related to Environmental, Social and Corporate Governance (ESG) issues of Connexin. The Policy applies to the Board of Directors (the Board), the Management Team, main service providers and staff at Connexin.

The Board is responsible for updating and approving this document. The Management Team is responsible for its proper implementation and reporting to the Board.

This policy was prepared by Connexin and approved by the Board.

Environmental

ISO 14001 Standard

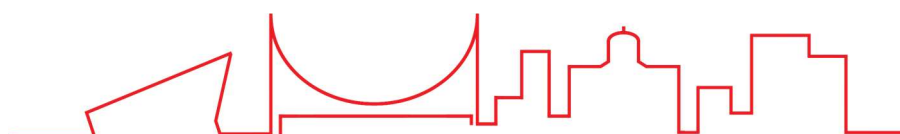
Connexin is accredited to BSI ISO 14001 and will continue to maintain this or the applicable equivalent standard.

Biodiversity and Habitat

Connexin’s aim is for its activities to have minimal impact on the surrounding biodiversity. Where possible it will improve biodiversity and will actively mitigate and monitor impacts of its construction activities, whether positive or negative. Where necessary and possible Connexin will investigate and complete adaptation and mitigation measures to support these aims.

Climate Change Adaptation and Resilience

Connexin’s aim is to understand the future risk and opportunities of climate change on its business and the community within which it operates and where practicable will conduct and integrate climate risk studies into its operational decisions. Where necessary and possible, Connexin will investigate and complete adaptation and mitigation measures for climate change. Connexin will engage with its customers and suppliers to consider the role it can play in the resilience of the urban environment to catastrophe or natural disasters.



Energy and Greenhouse Gas Emissions

The nature of Connexin's activity positions it on the low end of the environmental impact spectrum, including some positive environmental impacts of its IOT solutions. During the operation of Connexin's network assets, focus will be placed on the efficient use of power and clean sourcing of electricity to data centres and street apparatus and to the active side of the network to try to ensure our greenhouse gas emissions are minimised.

Connexin has the ambition of reaching net zero carbon by 2040, or to align with the emission targets of those jurisdictions to which it is subject.

Pollution and Environmental Impact

During construction, Connexin's environmental focus will be on avoiding hazards linked to breaking of unidentified underground existent utilities. In avoiding these hazards, we aim to reduce our possible intrusion into or cause contaminated land and release of hazardous substances. Connexin will also follow best industry practice for disposal of waste produced during construction. Connexin will strive to minimise air, noise and light pollution during development and operation of the asset.

Water

Connexin aims to ensure sustainable use of water resources by its operators.

Waste

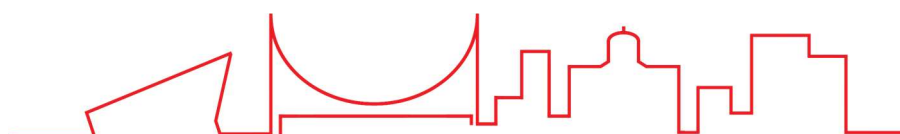
Connexin aims to support its operators and suppliers in reducing waste generation and diversion of materials to landfill. Where applicable, Connexin itself will reduce its waste generation and work with its suppliers to improve recycling and reuse efforts.

Pollution

Connexin intends to minimize air, light and noise pollution where necessary and possible. It will engage with its operators to further support this aim.

Sustainable Supply Chain

Connexin will ensure a sustainable supply chain, selecting materials based on their environmental impact and increasing resource efficiency. Where possible, this will focus on using locally sourced materials, reducing transportation requirements for material delivery and considering the embodied carbon of the development.



IOT Business Division

Connexin's IOT business division is focussing on using smart technology to support the digitisation of city council services and working closely with enterprise customers and utility suppliers to better manage their assets and infrastructure. We design, build, and implement solutions such as smart parking, smart waste management, smart air quality sensing, leakage detection and many others to help improve efficiencies and reduce environmental impacts. This in turns improve the quality of life and wellbeing for the general public.

Social

Labour Standards

The Board, the Management Team and main service providers will ensure that all employment engagements are subject to the employment laws and practices of England. Connexin does not condone or tolerate the use of child labour and modern slavery and will pass this through to its engagement with its suppliers. Connexin will implement such checks through its due diligence and procurement processes.

Employee Engagement

Connexin launched a mental health wellbeing programme during the Covid – 19 pandemic and will now extend this into the wellbeing hub which will be a resource for all employees to seek advice and help resources for their physical and mental wellbeing. We will be undertaking an employee satisfaction survey with an external provider and will be keeping the outcome of this under review. Other regular activities include the monthly “team lunch” which acts as a platform for conveying company news and also for a fun activity for which awards are given and charity events in which all can participate like the Macmillan great Trek.

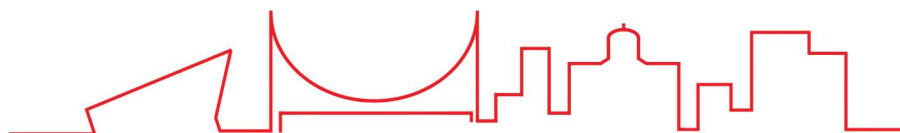
Equality and Diversity

Connexin wholeheartedly believes in the value and importance of equality and diversity and strive for broad diversity across directors, management and staff. Connexin actively monitors diversity statistics across its workforce and will look to partner with organisations to improve diversity in the digital sector.

Health and Safety ISO 45001

Connexin is accredited to ISO 45001 for Health and Safety and is committed to maintaining this or the equivalent standard. Connexin has recently appointed an internal SHEQ Manager who is accountable for ensuring that the standards are understood, adhered to and reported on.

Connexin has an objective of zero accidents and has put in place a series of Health and Safety measures and training which are monitored and discussed periodically in Board



meetings to identify improvement areas and prevent incidents. This extends across employees, contractors, supply chain and, where applicable, the community. We have engaged the services of a third-party training and recording platform to ensure compliance with all relevant legislation.

In addition to this, Connexin's current primary contractor has the responsibility of H&S during construction, its Project Manager will monitor its performance and report to the main contractor and to the Board any deviations or potential risks.

The current primary contractor will carry out training and toolbox talks every day to identify potential H&S risks and ensure they are avoided or mitigated to the greatest extent possible. Connexin requires the contractor to have in place an emergency and communication plan in case of accidents.

Connexin has partnered with Atlas Citation to provide advice, update and audit services for Health and Safety matters, Citation also provides a platform for reporting, monitoring and training materials.

Local Community Support

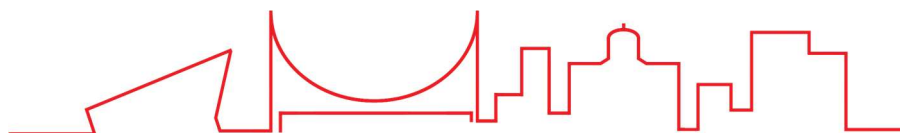
Connexin aims to promote development in the local community by not only supporting the technological advancement of the city, but also through hiring local people from diverse backgrounds, highlighting its commitment to the community.

Connexin will continue to work with local social enterprises, schools, colleges, and the local university to promote entrepreneurship and digital skills. One of its initiatives with a local school, is the Connexin £10 challenge where Connexin provides £10 to each class, in return for business plans and the pupils of each class compete to see who could make the biggest profit from selling a product or service. All proceeds go to the school trust to support less advantaged pupils who may require additional financial support. Connexin will continue its effort to drive for greater engagement with local educational bodies.

Connexin has committed to several different sponsorships with local sports teams and sporting figures. From simple shirt sponsorship of small grass-root football teams to nationally recognised rugby team such as Hull KR and internationally recognised boxing figure, Luke Campbell, MBE and 2012 gold medallist, Connexin will continue its work with local sports teams and governing bodies to promote healthy living and wellbeing.

Connexin has launched its Training Academy, backed by its industry leading engineering training facility to provide training to the local community with digital skills of the future.

Connexin has also recently launched "Connexin Cares" which is a community-based initiative supporting local charities and community groups.



Stakeholder Engagement

Connexin is committed to engaging with and fostering strong relationships with relevant stakeholders, these include local communities, contractors, operators, and customers. Where possible, we will also look to gauge customer satisfaction. We have conducted a customer satisfaction survey and will repeat that at least annually, and have developed a stakeholder management plan which sets out how we plan to engage with all relevant stakeholders. We monitor trust pilot scores and comments on weekly basis for our residential customers and actively engage with them to monitor any dissatisfaction and assess how we can make the customer experience better,

Governance

Governance Processes

The Connexin Board has an active role in Connexin's sustainability drive and supports continuous improvement of its ESG decision making. Connexin adheres to and subscribes to its shareholder responsible investment practices, including those set by its investors. Connexin believes in an open, transparent, and safe working environment and recognises and supports whistle-blower protection. Connexin will ensure that any engagement with lobbying groups is aligned with our climate change and other sustainability commitments as well as our shareholders' corporate commitments.

Fraud

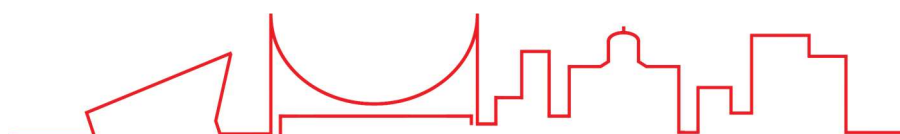
Connexin operates internal processes to eliminate fraudulent activity including a purchasing process which requires 2 points of approval for all purchases and the expenses policy and process which requires line manager approval and account approval for all employee incurred work related expenditure.

Executive Compensation

The Connexin Board includes a remuneration committee which meets as required to approve compensation matters. Shareholder approval is required for a number of reserved matters including the approval of employee packages which exceed a certain threshold.

Fiduciary Duties

Connexin and all its Board members are compliant with the highest anti-corruption standards and do not condone or tolerate unethical behaviour at any organisational level. Connexin has a zero tolerance approach to bribery. This applies to all levels of the organisation, particularly when dealing with public officers, including contractors and sub-contractors. Connexin has a zero tolerance approach to Money Laundering activity tax evasion and operates rigorous financial controls to support this policy.



Data Protection and Cybersecurity

Connexin ensures it meets statutory data protection and cybersecurity requirements. As a fibre optic network owner, Connexin understands the importance of upholding strong data protection and cybersecurity measures. It therefore integrates data protection and cybersecurity requirements throughout the asset lifecycle from due diligence through to operation.

Connexin is accredited to ISO 27001 for Information Security Management System and is committed to maintaining this to support its ongoing data protection and cybersecurity statutory requirements.

Transparency

Connexin is committed to good corporate governance driven through transparency and supported by annual external audits. This would include approval of donations which are proposed to be made which might be construed as having a political beneficiary or aim. Its Board directors agree to share any information which may result in a conflict of interest for Connexin, and all Board directors have presented to the Board a form in which they notify all other positions held in other corporations.

Sustainability Governance

Connexin control systems include approvals involving the Management Team, main service providers and staff as well as a monthly control on financials. During construction phases, Connexin will have an external Project Manager in place which has day to day control over construction cost and progress.

ESG is integrated throughout Connexin’s activities, with the board having oversight and final decision making upon ESG policy. The role of ensuring Connexin abides by this policy is delegated to the Management team and contractors and sub-contractors involved in Connexin projects.

Connexin Limited ESG Policy	
Approved By	Connexin Board
Approval Date	TBC
Approval Cycle	Annually
Policy Owner	SHEQ Manager: James Symonds
Approved for external use.	

